OFFICE OF THE
INFORMATION & PRIVACY
COMMISSIONER
for
British Columbia

SERVICE PLAN
2002-2005

Presented to the Legislative Assembly of British Columbia

February 21, 2002

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COMMISSIONER'S STATEMENT

Although the Office of the Information and Privacy Commissioner ("OIPC") is not, as an independent office of the Legislature, subject to the *Budget Transparency and Accountability Act*, I have directed that this service plan be prepared in the interests of transparency and accountability. All government policy decisions that I believe have material economic or operational implications have been considered in its preparation and I am committed to achieving the results it describes. The ability of the OIPC to operate effectively and efficiently depends on our receiving sufficient funding to fulfil our responsibilities. My commitment to achieving the results described in this service plan assumes adequate resources for the discharge of the OIPC's statutorily-mandated duties.

The government's commitment to openness and accountability is among the fundamental principles embodied in the *New Era* promises. The OIPC's role in that promise is to function as an independent oversight agency that ensures government operates in an open and accountable manner under the *Freedom of Information and Protection of Privacy Act* ("Act"). The OIPC also ensures that government complies with the Act's privacy requirements. The ability of the OIPC to achieve the planned results set out in this service plan, and effectively and efficiently discharge its duties and functions as mandated by statute, depends directly on adequate and stable funding.

As this service plan indicates, the OIPC faces considerable cost pressures. On the one hand, as section 9.1 indicates, we face material increases in operating costs for reasons beyond our control. On the other hand, as the environmental scan in section 5.0 indicates, the OIPC experienced in 2001 a significant increase in the numbers of access to information appeals and privacy invasion complaints (approximately 16% and 14%, respectively, over the previous year). The section 5.0 environmental scan also identifies other matters that are likely to have material impact on the OIPC's activities and thus add to its resource demands.

As the budget information found in section 9.2 indicates, the Select Standing Committee on Finance & Government Services ("Select Committee") recommended, in its December 2001 report, *Financial Review of Statutory Officers of British Columbia*, a substantial cut in funding for the OIPC for 2002-03 through 2004-05. For 2002-03, it recommended a 10% cut from the 2001-02 budget of $2,344,000 (which I had offered to freeze, despite upward cost pressures, for the next three years). The OIPC budget for 2002-03 will, in line with the Select Committee's recommended 10% cut, be $2,130,000. The Select Standing Committee recommended cuts of another 10% in 2003-04 and a further 15% for 2004-05. These cuts amount to a 35% reduction in the OIPC's budget, which cannot be absorbed without serious damage to the OIPC's delivery of services to British Columbians.

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The government is committed to balancing the provincial budget by 2004-05. Toward that end, all public agencies, including the OIPC, have been subjected to significant reductions in their funding. To meet the 10% cut for 2002-03, the OIPC is committed to finding innovative ways to resolve access disputes and privacy complaints without seriously affecting the timeliness or quality of service delivery to British Columbians. I believe that this year we will meet the challenge, although I fear that some decline in service will occur.

A second 10% cut in the OIPC's budget in 2003-04, as recommended by the Select Committee, would significantly compromise the OIPC's ability to perform its oversight duties and functions, thus calling into question the government's commitment to openness and accountability. To be clear, services to British Columbians would be unacceptably affected and the OIPC's effectiveness in ensuring openness and accountability in the public sector would be seriously harmed. If the final recommended cut of 15% is made in 2004-05, the injury to service delivery would be irreparable. That would not be a tolerable or defensible situation and I will make every effort to ensure it does not come about.

February 21, 2002

Victoria, British Columbia

David Loukidelis
Information and Privacy Commissioner
for British Columbia

TABLE OF CONTENTS

	SECTION	PAGE
1.0	**Our Vision**	1
2.0	**Our Mission**	1
3.0	**Our Values**	1
4.0	**Overview of the Office**	1
5.0	**Environmental Scan**	2
5.1	**Public Private Partnerships and Alternative Service Delivery**	2
5.2	**Legislative Environment**	2
5.3	**Information Technology and Privacy**	3
5.4	**E-government and Privacy**	3
5.5	**Privacy in the Private Sector**	3
5.6	***Lobbyist Registration Act***	4
5.7	**Legislative Responses to Terrorism**	4
6.0	**Summary of Goals**	4
7.0	**Goals, Objectives, Strategies, Performance Measures and Targets**	5
8.0	**Consistency with Government Strategic Plan**	8
9.0	**Financial Resources 2002-2005**	9
10.0	**Capital and Information Resource Management Plan**	13
10.1	**Information and Management Plan Directions**	13
10.2	**Major Projects**	14
10.3	**Commitment to Electronic Service Delivery**	14
10.4	**General Information Technology Plan**	14
11.0	**Human Resource Management Plan**	14

OFFICE OF THE INFORMATION AND PRIVACY COMMISSIONER FOR BRITISH COLUMBIA

SERVICE PLAN 2002-2005

1.0 OUR VISION

An open and accountable government in British Columbia that values and respects the privacy of its citizens.

2.0 OUR MISSION

To make government more open and accountable by ensuring that citizens receive access to information to which they are entitled and by preventing the unauthorized collection, use or disclosure of personal information by British Columbia public bodies (employing alternative dispute resolution methods whenever possible) and providing support, advice, training and education to both citizens and public bodies about access to information and privacy issues.

3.0 OUR VALUES

We believe access to information is a democratic right that is indispensable for public body openness and accountability.

We believe that privacy is a basic human right that protects individual autonomy and dignity, which are necessary for a healthy democratic society.

We treat citizens and public bodies with whom we deal with respect and fairness.

We believe the knowledge, skills and abilities of our staff are key to our success.

We work to provide a respectful and supportive professional working environment that encourages initiative.

4.0 OVERVIEW OF THE OFFICE

The Office of the Information and Privacy Commissioner ("OIPC") – which is under the direction of the Information and Privacy Commissioner, an officer of the Legislature – operates under the *Freedom of Information and Protection of Privacy Act* ("Act"). The Act creates a right of access to records of any of the roughly 1,800 public bodies covered by the Act. It also imposes on public bodies certain rules respecting the collection, use and disclosure of individuals' personal information. The Act covers provincial government ministries and agencies, Crown corporations, local governments, school boards, advanced education bodies, health care bodies, self-governing professions and occupations and many other organizations.

The OIPC provides services directly to the public. Under the Act, anyone who has sought access to records from a public body can appeal to the OIPC any act, decision or failure to act of the public body. If the appeal is not settled in mediation by an OIPC portfolio officer, the Commissioner will hold a formal inquiry and decide the matter. The Commissioner may, for example, uphold the public body's decision, order it to disclose information or waive a fee. An application for judicial review of a Commissioner's decision can be made to the British Columbia Supreme Court.

In addition, anyone who believes a public body has broken one of the Act's privacy rules can complain to the OIPC, which will investigate the complaint. If necessary, the Commissioner can order the public body to change its information practices. To date, however, the Commissioner has never made such an order, preferring instead to make recommendations for change, where necessary. Compliance with such recommendations has been excellent.

Further information about the OIPC can be found at www.oipcbc.org. A copy of the Commissioner's most recent annual report to the Speaker of the Legislative Assembly can be found at www.oipcbc.org/publications/annual/oipcbc-annual_report2000.pdf.

5.0 ENVIRONMENTAL SCAN

The access to information and privacy landscapes are undergoing significant changes on a number of accounts. A number of these changes confront the OIPC. The following discussion addresses the most significant of these challenges.

5.1 Public Private Partnerships and Alternative Service Delivery – Many of the roughly 1,800 public bodies covered by the Act will be affected by provincial government budget restraint and the results of the core services review. These initiatives may lead to the elimination of some services that have been provided by government and to the delivery of other services by public-private partnerships or other alternative models of service delivery. The challenge from an accountability and privacy perspective will be to ensure that the rights of access and privacy remain intact, regardless of the service delivery model. The OIPC will play a critical role in providing guidance and advice in this area, as well as in assisting citizens and service providers in navigating the new access and privacy landscape.

Smaller government may also result in delays for access to information due to greater operational pressures on existing resources, which may result in more appeals and complaints received by the OIPC and the need for more formal appeals.

5.2 Legislative Environment – The increasing complexity of access to information appeals and privacy complaints, coupled with the possibility of increasingly taxed resources, means it is critical for the OIPC to be able to handle appeals and complaints more flexibly. Increased flexibility will also save money for public bodies. A number of legislative changes would have to be made to allow this to happen.

First, the Act now gives applicants the final say in whether or not a formal access appeal must be held, regardless of the nature of the case and whether or not the Commissioner has already dealt with the issue in similar previous cases. Having to conduct such appeals imposes substantial pressures on OIPC resources. It also requires public bodies to prepare a formal case – with legal argument and affidavits – typically using legal counsel. This results in unnecessary costs, both to government and to other applicants who may wait longer for a response to their appeals. An amendment to the Act to allow such appeals to be disposed of in an informal, but fair, manner would resolve this concern.

Second, the Act now requires the Commissioner to personally issue all orders at the end of a formal inquiry, regardless of the nature of the case. No other jurisdiction in Canada requires this. This takes the Commissioner away from other pressing duties under the Act respecting oversight of the Act's administration. This may also result in applicants waiting longer than they should before receiving the results of their appeals. These concerns could be resolved if the Act allowed the Commissioner to delegate the order-making power, so that a delegate could handle simpler, more routine, appeals.

Third, the Act now requires public bodies to respond to all access requests, regardless of their nature, with the exception of those that the Commissioner agrees are repetitious or systematic in nature *and* that would unreasonably burden the public body's operations in responding. In a small minority of cases, some public bodies must expend their limited resources in dealing with abusive access requests that fall outside of the intent of the legislation. An amendment to the Act to allow public bodies to ignore such requests, with the permission of the Commissioner, would result in public body resources being used more cost-effectively.

5.3 Information Technology and Privacy – Increased use of electronic records in the health sector raises new privacy challenges. Information in health records is particularly sensitive and the vast majority of citizens expect their health information to be used in an appropriate and confidential manner. While information technology offers great promise in terms of improved quality of care and cost-savings, there is no doubt that the threats to privacy, including unauthorized access to and use of personal information are much more significant. Implementation of new electronic health information systems throughout the province has resulted in increased requests for OIPC comment on these initiatives and ongoing electronic health record initiatives will continue to require the OIPC to comment.

5.4 E-government and Privacy – As is the case with health information privacy and information technology, groundbreaking government initiatives in electronic service delivery and other forms of e-government can improve service and yield cost savings. The benefits of e-government cannot be underestimated, but there are risks for privacy. The OIPC will monitor these developments and will also be called upon more and more to comment on e-government initiatives.

5.5 Privacy in the Private Sector – The federal *Personal Information Protection and Electronic Documents Act* regulates the privacy practices of the private sector. At present, it only covers commercial transactions involving personal information collected, used or

disclosed by a federally regulated entity (*e.g.*, banks, airlines and telecommunications companies). That Act will extend to the provincially regulated private sector unless a substantially similar provincial Act is passed before January 1, 2004. A Special Committee of the Legislative Assembly recommended, in its March 20, 2001 report, that such a provincial law be passed. If the government decides to enact a made-in-British Columbia solution for private sector privacy issues, and if it gives the OIPC an oversight role under such legislation, this new role will have an influence on the mission of, and resources required, by the OIPC during the currency of this plan.

5.6 ***Lobbyist Registration Act*** – The Commissioner is the registrar under the recently enacted, but yet to be proclaimed, *Lobbyist Registration Act*. In the run-up to proclamation, the operational requirements that this new function will impose on the OIPC must be determined. For example, a lobbyist registry, website and staff support will be needed. The OIPC will require additional resources to effectively manage the new work. At present, the exact increase in resources is not known, since there are variables with respect to the registrar's role that have yet to be worked out by government.

5.7 Legislative Responses to Terrorism – In recent months, many legislatures, Parliament included, have proposed or enacted legislation that may limit access to information and privacy rights. The Commissioner acknowledges the need to ensure that law enforcement and intelligence services have the investigation and enforcement tools they need to detect and prevent terrorism. Further, police agencies in British Columbia are increasingly turning to new technologies for general law enforcement purposes. These technologies include video surveillance, biometrics and DNA testing. These developments all raise privacy issues that the OIPC must study and monitor under its statutory mandate. The OIPC also is increasingly asked to comment on law enforcement agencies' proposed use of new technologies. These developments will continue to increase the demand on the OIPC's resources.

6.0 SUMMARY OF GOALS

The OIPC's goals are as follows:

GOAL 1 Open and accountable government, in which citizens obtain access to information to which they are entitled under the Act.

GOAL 2 Respect for and protection of privacy.

GOAL 3 An effective and accountable office.

7.0 GOALS, OBJECTIVES, STRATEGIES, PERFORMANCE MEASURES AND TARGETS

GOAL 1 ***Open and accountable government, in which citizens obtain access to information to which they are entitled under the Act***

OBJECTIVES

1.1 Fair, effective and independent review of public body decisions about access to records.

1.2 Ensuring that citizens obtain timely, appropriate access to information.

1.3 Promoting citizen awareness of access issues and rights.

1.4 Encouraging responsible use of the Act by citizens.

1.5 Educating public bodies on their access to information obligations and on best practices in access to information.

STRATEGIES

- The OIPC will continue to resolve access appeals through mediation wherever possible.
- The OIPC will adjudicate unresolved access appeals through a formal inquiry process that complies with legal requirements of administrative fairness and due process.
- The OIPC will work to prevent and, where necessary, eliminate public body backlogs and delays in responding to access to information requests.
- The OIPC will investigate access complaints and report findings and recommendations to the parties and, where systemic access issues are involved, to the public.
- The OIPC will provide advice to public bodies on the implications for access of their proposed legislation, policies, programs and services.
- The OIPC will promote amendments to the *Freedom of Information and Protection of Privacy Act* that it considers desirable to achieve the goals of that Act.
- The OIPC will encourage public bodies to routinely disclose information and records without access requests, notably through the Internet.
- The OIPC will undertake site visits to public body facilities to assess adherence to regulatory requirements and to educate public bodies about their access to information obligations.
- The OIPC will hold, give or sponsor conferences, public speaking engagements, lectures, sector-specific training workshops and seminars on new and current access issues and practices.

- The OIPC will disseminate information on access issues through the OIPC website, the OIPC newsletter and guidelines to public bodies for best practices in access to information matters.

PERFORMANCE MEASURES

PERFORMANCE MEASURE	2002-03 TARGETS	2003-04 TARGETS	2004-05 TARGETS
Proportion of requests for review settled without inquiry	85%	85%	85%
Proportion of requests for review involving recurring issues in high volume public bodies	To be established		

GOAL 2 Respect for and protection of privacy

OBJECTIVES

2.1 Fair, effective and independent investigation of privacy complaints about a public body's collection, use or disclosure of personal information.

2.2 Ensuring that public bodies collect, use, disclose and store personal information accordance with the requirements of the *Freedom of Information and Protection of Privacy Act*.

2.3 Ensuring that emerging information technologies are used in a privacy-sensitive and lawful manner by public bodies.

2.4 Educating public bodies on their privacy obligations and best practices in privacy.

2.5 Promoting citizen awareness of privacy rights and issues.

STRATEGIES

- The OIPC will investigate privacy complaints and report its findings and recommendations to the parties and, where systemic privacy issues are involved, to the public.

- The OIPC will advise public bodies on the implications for privacy of their proposed legislation, policies, programs and services.

- By conducting site visits to public body facilities, the OIPC will assess adherence to regulatory requirements and educate public bodies about their privacy obligations.

- The OIPC will develop privacy impact assessment tools for use in assessing specific privacy-related issues as they arise and encourage their use by public bodies.

- Working with other information and privacy commissioners, the OIPC will prepare general data-sharing guidelines for use across Canada, thus ensuring that British Columbians' personal information is only shared according to a uniform set of rules.

- The OIPC will hold, give or sponsor conferences, public speaking engagements, lectures, sector-specific training workshops and seminars on new and current privacy issues and practices.

- By disseminating information on privacy issues through the OIPC website, including the OIPC newsletter and various sets of privacy guidelines, the OIPC will encourage and support legislative compliance.

PERFORMANCE MEASURES

PERFORMANCE MEASURE	2002-03 TARGETS	2003-04 TARGETS	2004-05 TARGETS
Acceptance and implementation of recommendations made on investigations of privacy complaints	100%	100%	100%

GOAL 3 An effective and accountable office

OBJECTIVES

4.1 The OIPC will operate in an open and accountable manner.

4.2 Ensure that staff are well trained across core OIPC competencies and are knowledgeable about current and likely information and privacy issues.

4.3 Staff succession is planned to ensure the OIPC continues to operate effectively.

STRATEGIES

- The OIPC will publish a comprehensive annual report on its performance, which will include data on whether it has met its performance measure targets.

- The OIPC will promote legislative amendments necessary to ensure its work under the Act is efficient and of the highest possible utility.

- The OIPC will respond promptly to complaints about its performance in a fair, open and effective manner.

- By managing staff workloads, and through ongoing training and development, the OIPC will enhance its human capital.

- The OIPC will create and implement a succession plan.

PERFORMANCE MEASURES

PERFORMANCE MEASURE	2002-03 TARGETS	2003-04 TARGETS	2004-05 TARGETS
Annual report prepared	Report completed before Q2 of next year	Report completed before Q2 of next year	Report completed before Q2 of next year
Training time/costs as a percentage of base salary	1.5%	2%	3%
Succession plan	Plan developed	Plan implementation	Plan implementation
Develop assessment tool for client feedback	Tool to be created and rolled out		

8.0 CONSISTENCY WITH GOVERNMENT STRATEGIC PLAN

The OIPC's operations, and this service plan, strongly support the following government priorities:

1. The *New Era: BC Government Vision* commitment to make the British Columbia provincial government the "most open, accountable and democratic government in Canada."

2. The following British Columbia government principles:

   - Ensure open government and accountable decision-making.

   - Enhance focus on customer service.

3. Core values and service principles of fair treatment, open government, accountability, value and innovation.

9.0 FINANCIAL RESOURCES 2002-2005

This section sets out the proposed annual operating expenditures for the OIPC and touches on the recommendations made in that respect by the Select Standing Committee on Finance & Government Services ("Select Committee") in its December 2001 report, *Financial Review of Statutory Officers of British Columbia.*

9.1 Background to OIPC's Budget Situation – In July 2001, the OIPC sought a budget increase of $240,000. This request was turned down, but the OIPC was told that it would be considered for 2002-2003. In light of intervening changes in economic conditions, in British Columbia and around the world, the OIPC reconsidered its position and decided not to seek additional resources. The OIPC's request for fiscal years 2002-2003 through 2004-2005, as presented to the Select Standing Committee in November 2001, was therefore frozen at the 2001-2002 amount.

Cost Pressures on OIPC Resources

It is important to note that the OIPC sought no increase in its budget to offset increases in the CPI. It should also be noted that 2002-2003 introduced material increases in certain of the OIPC's costs:

- 2.5% salary increase for staff at the beginning of 2002-2003, with a related increase in benefits costs,
- increase in building occupancy charges in 2002-2003 to $255,000 from $235,000, which represents 1% of the OIPC's overall budget (these figures have since been reduced by the OIPC's giving up space, as discussed elsewhere in this document), and
- increase in the Commissioner's salary, with a related increase in benefits costs.

Further, if the annual CPI increase is 2% each year, the cumulative increase over the three fiscal years will materially decrease the OIPC's resources.

In light of the above-noted cost increases, and the prospect of budget restraint, the OIPC took a number of steps to realize cost-efficiencies, to ensure that the OIPC's resources are, to the greatest extent possible, dedicated to providing services to citizens and public bodies. The OIPC had implemented cost savings before it made its budget proposal to the Select Committee. Since the Select Committee's report, the OIPC has given up part of its office in order to reduce rental costs and meet the budget recommendations of the Select Standing Committee for 2002-03.

The Commissioner also has directed that three FTE positions be eliminated, again to meet the budget recommendations of the Select Standing Committee. One of these positions is a Portfolio Officer (ML4) position and two are Administrative Assistant (CS3) positions. The Portfolio Officer position represents a loss of one FTE that is dedicated exclusively to the delivery of services in, among other things, mediating and resolving access to information appeals and privacy complaints. Elimination of the other two positions leaves no vacation

or illness backup for the OIPC's receptionist's position, which is responsible for screening numerous non-jurisdictional inquiries each day. It also means there is no illness or vacation backup, at present, for the OIPC's Registrar of Inquiries, who is responsible for organizing and expediting access to information appeal hearings held by the Commissioner.

As a result of the Select Standing Committee's budget recommendations, the OIPC's budgets for a variety of other activities have been cut substantially, including for legal services. The OIPC uses outside legal counsel on an as-needed basis in matters such as judicial review proceedings brought by the provincial government or other public bodies against decisions by the Commissioner.

Last, but not least, at the Commissioner's suggestion, officers of the Legislature last year began looking at shared services, to determine whether, and how, the sharing of services (including through private sector provision of services) can realize cost-efficiencies while maintaining service levels and quality. A private sector consultant engaged to examine shared services concepts is expected to report the results of his analysis, and present options to the officers of the Legislature, before the end of February 2002. The officers will decide how to proceed in light of that analysis. That decision must, among other things, account for the fact that the Members' Conflict of Interest Commissioner and the Auditor General have decided not to further examine, or proceed with, shared services at this time.

To be clear, the OIPC will, in order to protect its ability to discharge its statutory duties effectively and as required by law, continue to search for ways of efficiently using its resources. In light of the modest portion of the OIPC's finances devoted to administration of the OIPC, and the fact that rental costs are a relatively small and inflexible part of the OIPC's overall budget, the OIPC is concerned that further cuts in its budget will negatively affect its ability to perform its statutory role. This concern is discussed above, in the Commissioner's introductory statement.

Increases in Demands for Service

The environmental scan in part 5.0, above, refers to the increased complexity of many of the access appeals and privacy complaints that the OIPC handles. It should also be noted that, based on statistics at December 31, 2001 – which are subject to a verification process that is likely to yield higher, not lower numbers – the OIPC expects to see a 16% increase in the number of access appeals in calendar 2001, as compared to calendar 2000. The total number of access appeals as at December 31 was 952, as compared to the total of 823 for 2000. The number of privacy complaints (which is also subject to confirmation) was, at that date, 107 as opposed to 93 for 2000. This would be a 14% increase over 2000. These trends were brought to the attention of the Select Standing Committee. This significant increase in access appeal and complaint numbers imposes considerable added demands on the OIPC's resources.

9.2 OIPC Budget 2002-2005 – At p. 19 of its report, the Select Standing Committee made the following recommendation for the budget resources for the OIPC over the next three fiscal years:

> The Committee recommends:
>
> - That the Information and Privacy Commissioner's existing baseline budget of $2,359,000 [the OIPC was later advised that this figure included the capital budget] should be reduced by 10 percent in 2002/03; by 10 percent in 2003/04; and by 15 percent in 2004/05.
> - That the Information and Privacy Commissioner should receive an annual capital budget of $15,000 for the next three fiscal years (2002/03 – 2004/05).

The OIPC's 2002-03 budget submission, made in line with the above recommendations by the Select Committee, is set out below (including by expenditure breakdown). It should be noted here that the 2003-04 and 2004-05 budgets at this time do not, in light of the Commissioner's Statement, reflect the Select Committee's recommendation for those years.

OIPC Budget

	2002-2003	2003-2004	2004-2005
FTEs (includes Commissioner & 1 law co-op student)	20	22	22
Salaries & Benefits	$1,634,000	$1,724,000	$1,724,000
Operating Costs	$ 511,000	$ 635,000	$ 635,000
Recoveries (Conference)	-$ 15,000	-$ 15,000	-$ 15,000
Total Expenses	$2,130,000	$2,344,000	$2,344,000
Total Capital Expenses	$ 15,000	$ 15,000	$ 15,000

Consistent with the Commissioner's intention, set out in his statement above, to call on the Select Committee to reconsider its recommendations for 2003-04 and 2004-05, the expenses for those years are shown above at the 2001-02 level.

OIPC Operating Expenditures 2002 - 2003

Salaries and Benefits

STOB	Description	Annual Estimates 2002-2003
E50A	Base Salaries	$1,155,000
E51A	Supplementary Costs	$ 5,000
E52A	Employee Benefits	$ 305,000
E54A	Legislative Salaries	$ 169,000
	Total Salaries & Benefits	**$1,634,000**

Operating Expenses

STOB	Description	Annual Estimates 2002-2003
E57A	Staff travel	$ 35,000
E60A	Professional Services	$106,000
E63A	Informational Services	$ 83,000
E65A	Office and Business Expenses	$ 85,000
E68A	Statutory Advertising and Publications	$ 2,000
E73A	Amortization Expense	$ 15,000
E75A	Building Occupancy Charges	$185,000
	Total Operating Expenses	**$ 511,000**

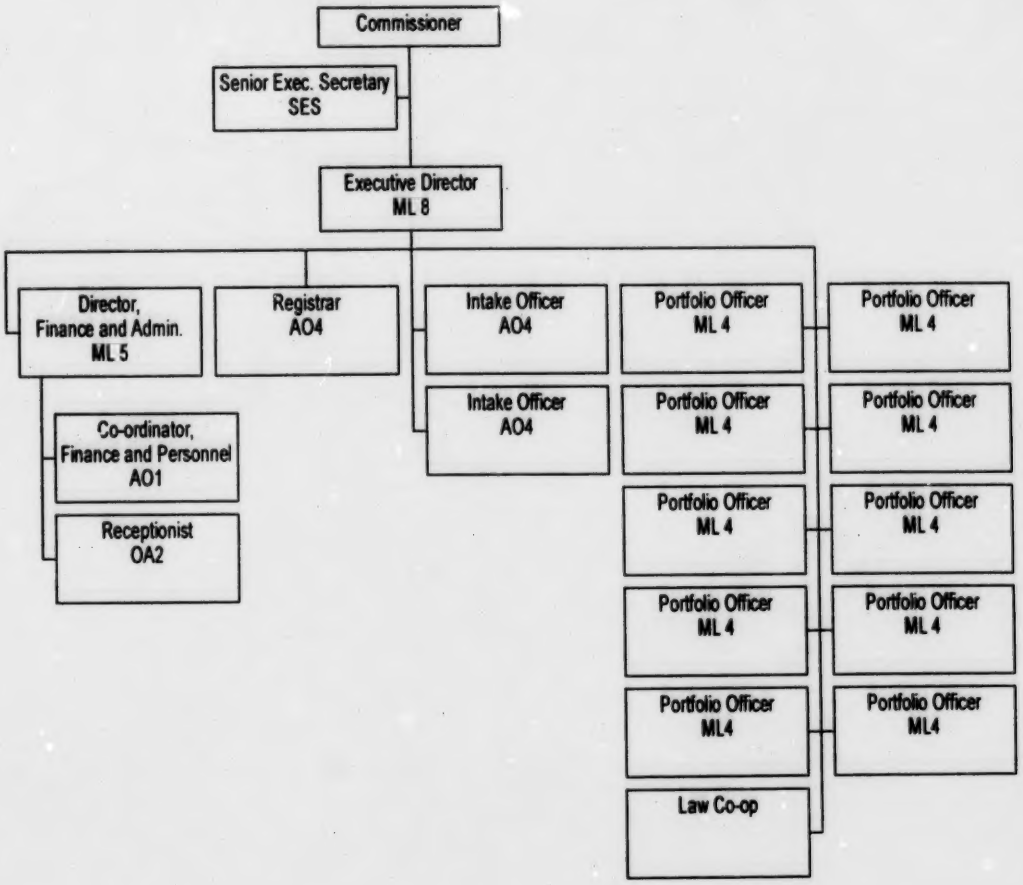
Recoveries

STOB	Description	Annual Estimates 2002-2003
E89A	Recoveries External to the CRF	**-$15,000.00**
	Total Recoveries	**($15,000.00)**

Capital Expenses

STOB	Description	Annual Estimates 2002-2003
A08A	Information Systems (computer Hardware and Software)	$15,000
	Total Capital Expenses	**$15,000**

OIPC Organization Chart



10.0 CAPITAL AND INFORMATION RESOURCE MANAGEMENT PLAN

10.1 Information Management Plan Directions – The OIPC will update and upgrade computer hardware and software to meet government requirements. To meet these goals, the OIPC will require a capital budget of $15,000. (It is estimated the same costs will be required for each of fiscal 2004 and 2005 to maintain the OIPC's information technology assets.)

The OIPC also periodically updates its case tracking system, which enables staff to keep up-to-date information for each file for which they are responsible. This allows management to monitor case handling and staff workloads. It also generates statistics for the OIPC's annual report. This system is reviewed regularly for potential improvements.

10.2 Major Projects – Beyond continuing to update and upgrade computer hardware and software in fiscal 2003, there are no major projects planned.

When the *Lobbyist Registration Act* is brought into force, a major project for the OIPC under that Act will include making registration available electronically. The OIPC is currently looking into more detailed costing for this item. The software for the Ontario lobbyist registration program, for example, cost in excess of $200,000, but it remains to be seen how much it would cost here.

10.3 Commitment to Electronic Service Delivery – The OIPC is dedicated to electronic service delivery. Our website is at present being upgraded to make it more user-friendly and effective. The OIPC is considering how to accept access appeals and privacy complaints electronically and is considering how to accept legal submissions electronically during the appeal process.

10.4 General Information Technology Plan – The general information technology plan for the OIPC is to update and upgrade the information and technology hardware and software to meet evolving government standards.

11.0 HUMAN RESOURCE MANAGEMENT PLAN

The OIPC's human resource management plan will be developed through the strategies outlined in Goal 3, which are to enhance human capital through workload management, training and development and implementation of a succession plan.

The OIPC continuously manages workloads by monitoring file assignments and referring files according to staff specialties.

Training is an ongoing commitment and staff will continue to receive training opportunities. Training in alternative dispute resolution techniques is of notable importance to the OIPC.

The OIPC's succession plan will be developed over the next fiscal year.

* * *